

DENNIS J. HERRERA, State Bar #139669  
City Attorney  
JOANNE HOEPER, State Bar #114961  
Chief Trial Deputy  
RONALD P. FLYNN, State Bar #184186  
WARREN METLITZKY, State Bar # 220758  
Deputy City Attorneys  
Fox Plaza  
1390 Market Street, 6<sup>th</sup> Floor  
San Francisco, California 94102-5408  
Telephone: (415) 554-3901  
Facsimile: (415) 554-3837

Attorneys for Defendants  
CITY AND COUNTY OF SAN FRANCISCO,  
KEVIN WORRELL, and DAMIEN FAHEY

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

ADRIENNE MACBETH,

Plaintiff,

vs.

CITY AND COUNTY OF SAN  
FRANCISCO, a municipal corporation;  
KEVIN WORRELL, individually and in  
his official capacity as a police officer for  
the CITY AND COUNTY OF SAN  
FRANCISCO, DAMIEN FAHEY,  
individually and in his official capacity as  
a police officer for the CITY AND  
COUNTY OF SAN FRANCISCO; and  
DOES 1-50, individually and in their  
official capacities.

Defendants.

Case No. C07-3304 MEJ

STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND EXPERT  
DISCOVERY DATES

Date Action Filed: June 22, 2007  
Trial Date: December 8, 2008

Plaintiff Adrienne MacBeth and Defendants City And County Of San Francisco, Kevin Worrell, and Damien Fahey (the "Parties") by and through their counsel hereby stipulate as follows:

The parties have a settlement conference in this matter set for June 13, 2008 and desire to extend the designation of experts until beyond that date. Currently, the schedule for experts is as follows:

Disclosure of Experts (Rule 26(a)(2)(B))	May 12, 2008
Disclosure of Rebuttal Experts (Rule 26(a)(2)(B))	May 22, 2008
Close of Expert Discovery	June 6, 2008

(Case Management Order [Docket #23] at 6-7.

The parties stipulate to the following schedule regarding experts:

Disclosure of Experts (Rule 26(a)(2)(B))	July 1, 2008
Disclosure of Rebuttal Experts (Rule 26(a)(2)(B))	July 15, 2008
Close of Expert Discovery	August 1, 2008

For good cause, the Parties request that the Court order that the above schedule be experts be entered.

Dated: May 12, 2008

DENNIS J. HERRERA  
City Attorney  
JOANNE HOEPER  
Chief Trial Deputy  
RONALD P. FLYNN  
WARREN METLITZKY  
Deputy City Attorneys

-/s/- *Ronald P. Flynn*

By: \_\_\_\_\_  
RONALD P. FLYNN

Attorneys for Defendants  
CITY AND COUNTY OF SAN FRANCISCO,  
KEVIN WORRELL, and DAMIEN FAHEY

1 Dated: May 12, 2008

2 SANFORD M. CIPINKO  
3 JEREMY CLOYD  
4 LAW OFFICE OF SANFORD M. CIPINKO

5 \*

6 By: \_\_\_\_\_  
7 JEREMY CLOYD

8 Attorneys for Plaintiff  
9 ADRIENNE MACBETH


10 \* The ECF filer attests that concurrence in the filing of the document has been obtained from this  
11 signatory. Civ. L. R. Gen. Order 45, § X (B).

12 [PROPOSED] ORDER

13 For Good Cause, the Court modifies the expert dates as listed above.

14 IT IS SO ORDERED

15 Dated: May 12, 2008  
16 \_\_\_\_\_

17 By:  \_\_\_\_\_  
18 MARIA ELENA JAMES  
19 United States Magistrate Judge